

FILED

MAR 17 2020

U.S. DISTRICT COURT-WVND  
MARTINSBURG, WV 25401

UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF WEST VIRGINIA

UNITED STATES OF AMERICA,

v.

QUNDRE ISALIAH PAYTON,

Defendant.

Criminal No.

3:20-CR-

9

Violations:

18 U.S.C. § 922(a)(6)

18 U.S.C. § 924(a)(2)

INDICTMENT

The Grand Jury charges that:

COUNT ONE

(False Statement During Purchase of Firearms)

On or about December 21, 2019, in Berkeley County, in the Northern District of West Virginia, defendant **QUNDRE ISALIAH PAYTON**, in connection with the acquisition of firearms, that is a Taurus, Model G2C, 9mm pistol, serial number AAM096342; a Taurus, Model G2C, 9mm pistol, serial number TMU65984; and a Taurus, Model G2C, 9mm pistol, serial number AAM099628, from a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code (herein referred to as the "FFL"), knowingly made a false and fictitious written statement to the FFL, which statement was intended and likely to deceive the FFL, as to a fact material to the lawfulness of such sale of the said firearms to defendant **QUNDRE ISALIAH PAYTON** under chapter 44 of Title 18, in that the defendant represented he resided at Route 25

Barron Drive, Institute, West Virginia; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

**COUNT TWO**

(False Statement During Purchase of Firearm)

On or about January 4, 2020, in Berkeley County, in the Northern District of West Virginia, defendant **QUNDRE ISALAH PAYTON**, in connection with the acquisition of a firearm, that is a Kimber, Model Custom II, .45 caliber ACP, serial number K656908, from a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code (herein referred to as the “FFL”), knowingly made a false and fictitious written statement to the FFL, which statement was intended and likely to deceive the FFL, as to a fact material to the lawfulness of such sale of the said firearm to defendant **QUNDRE ISALAH PAYTON** under chapter 44 of Title 18, in that the defendant represented he resided at Route 25 Barron Drive, Institute, West Virginia; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

**FORFEITURE ALLEGATION**

*Gun Control Act*

Pursuant to Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 924(d)(1), the government will seek the forfeiture of any firearm and any ammunition involved in or used in any knowing violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2), a Taurus, Model G2C, 9mm pistol, serial number AAM096342; a Taurus, Model G2C, 9mm pistol, serial number TMU65984; a Taurus, Model G2C, 9mm pistol, serial number AAM099628; Glock, Model 19, 9mm pistol, serial number BFE2365; Smith & Wesson, Model SD9VE, 9 caliber pistol, bearing serial number FBE0017; Smith & Wesson, Model SD9VE, 9 caliber pistol, bearing serial number FHK4266; and Smith & Wesson, Model SD9VE, 9 caliber pistol, bearing serial number FBM8063.

A True Bill,

/s/ \_\_\_\_\_  
Grand Jury Foreperson

/s/ \_\_\_\_\_  
WILLIAM J. POWELL  
UNITED STATES ATTORNEY

Lara K. Omph-Botteicher  
Assistant United States Attorney

UNITED STATES DISTRICT COURT

for the

Northern District of West Virginia

United States of America

v.

QUNDRE ISAAH PAYTON

*Defendant*

Case No.

3: 20CR9

**ARREST WARRANT**

To: Any authorized law enforcement officer

**YOU ARE COMMANDED** to arrest and bring before a United States magistrate judge without unnecessary delay

(name of person to be arrested) QUNDRE ISAAH PAYTON


who is accused of an offense or violation based on the following document filed with the court:

- ☒ Indictment    ☐ Superseding Indictment    ☐ Information    ☐ Superseding Information    ☐ Complaint  
☐ Probation Violation Petition    ☐ Supervised Release Violation Petition    ☐ Violation Notice    ☐ Order of the Court

This offense is briefly described as follows:

False statement during purchase of firearm  
Illegal transporation of Firearm  
Transportation of Firearm with Intent to Commit Felony  
False Statement during Purchase of Firearm

Date: 03/17/2020

  
Issuing officer's signature

City and state: Martinsburg, WV

Robert W. Trumble, United States Magistrate Judge

*Printed name and title*

**Return**

This warrant was received on (date) \_\_\_\_\_, and the person was arrested on (date) \_\_\_\_\_  
at (city and state) \_\_\_\_\_.

Date: \_\_\_\_\_

*Arresting officer's signature*

*Printed name and title*